

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DEANA L. GAFFNEY	:	UNITED STATES BANKRUPTCY
	:	COURT FOR THE EASTERN DISTRICT
DYNAMIC EQUITY PARTNERS, INC.	:	OF PENNSYLVANIA
Movant	:	
vs.	:	
DEANA L. GAFFNEY	:	
Debtor	:	
WILLIAM C. MILLER	:	
Trustee	:	
	:	Case No.: 21-11024-amc
	:	

NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

DYNAMNIC EQUITY PARTNERS, INC., has filed a Motion for Relief from Stay, with the Court for Relief from the Automatic stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in this motion, then on or before **July 29, 2021** you or your attorney must do all of the following:

- (a) File an answer explaining your position at:

United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) Mail a copy to Movant's attorney:
Adrienne N. Anderson, Esquire
The Law Offices of Michael Kuldiner, P.C.
922 Bustleton Pike
Feasterville, PA 19053

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above the attend the hearing, the court may enter an order granting the relief requested in this motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashley M. Chan, the United States Bankruptcy Judge in Courtroom 4 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299 on **August 16, 2021, at 11:00 a.m.**, or as soon thereafter as counsel can be heard to consider this motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Movant is Dynamic Equity Partners, Inc. having a mailing address of P.O. Box 85, Huntingdon Valley, PA 19006 (the "Movant").

Law Offices of Michael Kuldiner, P.C.
922 Bustleton Pike, 1st Floor
Feasterville, PA 19053

Date: 07/15/2021

By: 

Adrienne N. Anderson, Esquire
Attorney I.D. 306424

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CERTIFICATE OF SERVICE

I, Adrienne N. Anderson, Esquire, attorney for Movant, do hereby certify that I caused true and correct copies of the foregoing Motion of DYNAMIC EQUITY PARTNERS, INC. for Relief From Automatic Stay and NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE to be served on July 15, 2021, by first class mail, and/or electronic means upon those listed below:

Debtor(s)

Deana L. Gaffney
533 Fern Street
Lansdowne, PA 19050

Trustee

William C. Miller, Esquire
P.O. Box 1229
Philadelphia, PA 19105
VIA ECF

Attorney for Debtor(s)

Zachary Perlick, Esquire
1420 Walnut Street, Suite 718
Philadelphia, PA 19102
VIA ECF

Office of the US Trustee

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106

Law Offices of Michael Kuldiner, P.C.
922 Bustleton Pike, 1st Floor
Feasterville, PA 19053

Date: 07/15/2021

By: 

Adrienne N. Anderson, Esquire
Attorney for Movant
Attorney I.D. 306424
Phone: 215-942-2100; Fax: 215-942-9664